

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Case No. 1:23-cv-00423-WO-JLW

TIMIA CHAPLIN; SARAH FIELDS;  
SAYELINE NUNEZ; THOMAS HAYWARD;  
KEVIN SPRUILL; ROTESHA MCNEIL;  
QIANA ROBERTSON; YOUSEF JALLAL;  
MESSIEJAH BRADLEY; DENNIS KEITH  
LASSITER; PAULINO CASTELLANOS;  
ROBERT LEWIS; and ALLEN SIFFORD, on  
behalf of themselves and all others similarly  
situated,

*Plaintiffs,*

v.

GARY L. MCFADDEN, officially, as the  
Sheriff of Mecklenburg County; JOHN DOE  
SURETY, as surety for the Sheriff of  
Mecklenburg County; WILLIE R. ROWE,  
officially, as the Sheriff of Wake County;  
BRIAN ESTES, officially, as the Sheriff of Lee  
County; THE OHIO CASUALTY  
INSURANCE COMPANY, as surety for the  
Sheriffs of Wake County and Lee County;  
TYLER TECHNOLOGIES, INC; RYAN  
BOYCE, officially, as the Executive Director of  
the North Carolina Administrative Office of the  
Courts; BRAD FOWLER, officially, as the  
eCourts Executive Sponsor and Chief Business  
Officer of the North Carolina Administrative  
Office of the Courts; ELISA CHINN-GARY,  
individually and officially, as the Mecklenburg  
County Clerk of Superior Court; BLAIR  
WILLIAMS, individually and officially, as the  
Wake County Clerk of Superior Court; SUSIE  
K. THOMAS, individually and officially, as the  
Lee County Clerk of Superior Court; and DOES  
1 THROUGH 20, INCLUSIVE,

*Defendants.*

**PROOF OF SERVICE**

Pursuant to Rule 4(I) of the Federal Rules of Civil Procedure, plaintiffs in the above-captioned action (“Plaintiffs”), on behalf of themselves and all others similarly situated, hereby submit as proof of service and attached as **Exhibit A** hereto, a copy of an Affidavit of Service evidencing that copies of the Second Amended Complaint [Doc. 77] and Summons [Doc. 78] (collectively, the “Service of Process Packet”) were served on defendant Gary L. McFadden, officially, as the Sheriff of Mecklenburg County, on March 5, 2024. Specifically, Plaintiffs deposited a copy of the Service of Process Packet with a designated delivery service, addressed and delivered to defendant Sheriff McFadden, and obtained a corresponding delivery receipt, thereby satisfying service of process on defendant Sheriff McFadden pursuant to Rule 4 of the Federal Rules of Civil Procedure and North Carolina General Statute § 1A-1-4.

Respectfully submitted this the 12th day of March, 2024.

/s/ Gagan Gupta

Gagan Gupta (NCSB #: 53119)

Email: ggupta@tinfulton.com

Abraham Rubert-Schewel (NCSB #: 56863)

Email: schewel@tinfulton.com

Zachary William Ezor (NCSB #: 55070)

Email: zezor@tinfulton.com

TIN FULTON WALKER & OWEN PLLC

119 Orange Street

Durham, NC 27701

Telephone: (919) 307-8400

Akeeb Dami Animashaun

355 S Grand Avenue, Suite 2450

Los Angeles, CA 90071

Telephone: (929) 266-3971

Email: dami@animashaun.me

*Counsel for Plaintiffs on behalf of  
themselves and all others similarly situated*

## CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the attorney is, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on this day, copies of the foregoing will be served on the following by electronic mail or by the Court's Case Management / Electronic Case Filing ("CM/ECF") system:

Robert Lane  
WAKE COUNTY SHERIFF'S OFFICE  
330 S. Salisbury Street  
Raleigh, NC 27602  
Telephone: (919) 856-5380  
Email: robert.lane@wake.gov

Gregory L. Skidmore  
ROBINSON BRADSHAW  
101 N. Tryon Street, Suite 1900  
Charlotte, NC 28246  
Telephone: (704) 377-8144  
Email: gskidmore@robinsonbradshaw.com

Roger A. Askew  
WAKE COUNTY ATTORNEY'S OFFICE  
P.O. Box 550  
Raleigh, NC 27602  
Telephone: (919) 856-5500  
Email: roger.askew@wakegov.com

Hampton Hunter Brown  
ROBINSON BRADSHAW  
1450 Raleigh Road, Suite 100  
Chapel Hill, NC 27517  
Telephone: (919) 328-8800  
Email: hbruton@robinsonbradshaw.com

*Counsel for Defendant Willie R. Rowe*

James R. Morgan, Jr.  
WOMBLE BOND DICKINSON (US) LLP  
One West Fourth Street  
Winston-Salem, NC 27101  
Telephone: (336) 721-3710  
Email: Jim.Morgan@wbd-us.com

Garrett Steadman  
ROBINSON BRADSHAW  
101 N. Tryon Street, Suite 1900  
Charlotte, NC 28246  
Telephone: (704) 377-8179  
Email: gsteadman@robinsonbradshaw.com

*Counsel for Defendant Tyler Technologies, Inc.*

Nicholas David Acevedo  
WOMBLE BOND DICKINSON (US) LLP  
197 Merrimont Drive  
Winston-Salem, NC 27106  
Telephone: (908) 329-0300  
Email: nick.acevedo@wbd-us.com

*Counsel for Defendant Brian Estes*

\* \* \* Additional Counsel and Signature Block Appear on Next Page \* \* \*

Frederick M. Thurman, Jr.  
SCHUMAKER, LOOP & KENDRICK, LLP  
101 S. Tryon Street, Suite 2200  
Charlotte, NC 28280  
Telephone: 704-375-0057  
Email: fthurman@slk-law.com

*Counsel for Defendant The Ohio Casualty Insurance Company*

Elizabeth Curran O'Brien  
NORTH CAROLINA DEPARTMENT OF JUSTICE  
P.O. Box 629  
Raleigh, NC 27602  
Telephone: (919) 716-0091  
Email: eobrien@ncdoj.gov

*Counsel for Defendants North Carolina Administrative Office of the Courts, Ryan Boyce,  
Brad Fowler, Blair Williams, Susie K. Thomas and Elisa Chinn-Gary*

The undersigned attorney certifies under penalty of perjury that the forgoing is true and correct.

This the 12th day of March, 2024.

/s/ Gagan Gupta

Gagan Gupta (NCSB #: 53119)

*Counsel for Plaintiffs on behalf of  
themselves and all others similarly situated*